

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

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Sheila D CARTER

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Charleston South Carolina
DSS Charleston South Carolina
3366 Rivers Ave North Charleston, SC
29405

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. 77-DQ-10-1308
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Sheila D Carter
 Street Address 2116 County Line Road
 City and County Kingsmountain Cleveland
 State and Zip Code North Carolina - 28086
 Telephone Number 980-291-2325

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name Department of Social Services
 Job or Title DSS.
 (if known)
 Street Address 3366 Rivers Ave, North
 City and County Charleston, SC, 29405 Charleston
 State and Zip Code South Carolina 29405 County
 Telephone Number 843-953-9400

Defendant No. 2

Name Charleston South Carolina
 Job or Title
 (if known)
 Street Address 100 Broad St. Ste 143
 City and County Charleston SC. Charleston County
 State and Zip Code Charleston S.C 29401
 Telephone Number 843-958-4400

Defendant No. 3

Name Family Courts

over

Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number

Defendant No. 4

Name
Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

we was married Jan 20, 1977 in Charleston SC
To Dewayne Lee CAMP, I had a Baby Nov, 19, 1977
me + Dewayne Divorced he had 10 Days Visitation

By Judge Robert Mallard on the 11 Day Dewayne

Called me and Told me He Wasnt Ever Bringing my Son
Back I called my Attorney nowell Losser 843-577-6866
nowell Losser called Judge mallard he Didnt Do nothing

my Son has Remained in Texas

46 years - I Had Legal Custody of
my son Shawn Lee Camp I've Suffered
The Loss grieved Cried Ever Since and
anger set in for what happened to me
I still have no contact with my Son
for the Lies he's Been told about me!
the FBI Should have Been Called To
go get my Son and Bring Him Home!
the grand Parents malcolm Camp - gloria
Camp - ~~Shawn~~ Should have Been arrested
for Federal Kid Napping. my Ex stayed in
Charleston County Jail 60 days. I want Justice
for all the Pain and for Crying Grieving
and the Damages its Done to me and my
Son! you aint got no Idea How Angry I
am!

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Sheila D Carter is a citizen of the State of (name) North Carolina

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Charleston SC, is a citizen of the State of (name) South Carolina Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Department Social Services incorporated under the laws of the State of (name) Charleston S.C., and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

as much as easing my Pain
46 year's

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I am Sheila D Carter I was married
To Dewayne Lee Camp in Jan 20th 1977
he was in the Navy in Charleston SC, I Had a Baby
Nov 19th 1977 3 days after my Son Shawn Lee Camp
was born DSS and Police came to my Room and Removed
my son Shawn from my care, Dr Chellapa took a Bribe from
my ex in laws to Remove Shawn from my custody I wasnt
shown no papers to Remove him - He was then put in Foster
care by DSS

IV. Relief
State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Shawn Remained in Foster Care 3 month's, then we went
to Court By Judge Robert Mallard, he gave me Legal
Custody of my Son! the he let my Ex in laws take my
Son to Texas for 10 Day's visitation then he was to be
Brought Home to me, that Didnt happen the Camp's called
me and said they wasnt Bringing him Back, I called
my lawyer nowell Losser 843-577-6866 he called
Judge Mallard he Didnt Do nothing - the FBI should
have Been Called it was federal Kidnapping

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing 3-23-, 2023

Signature of Plaintiff

Printed Name of Plaintiff

Sheila D Carter

SHEILA D CARTER

Nowell Lessor said how will be my witness

B. For Attorneys

843-577-6866

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address